



EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

Ben G. Almond • Vice President, Regulatory Affairs • Phone 202.419.3020 • fax 202.419.3047

April 20, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RECEIVED

APR 20 2006

ORIGINAL

Federal Communications Commission
Office of Secretary

RE: Hearing Aid Compatibility
WT Docket No. 01-309
EX PARTE

Dear Ms. Dortch:

On April 19, representatives of Cingular Wireless: Mike Roden, Executive Director-Regulatory & Legal; Mel Frerking, Director-Technology Network R&D; Susan Mazrui, Director-Regulatory & Legal and the undersigned met with members of the Office of Engineering and Technology: Julius Knapp, Deputy Chief-Management Committee; Rashmi Doshi, Chief-Laboratory Division and their staff members: Alan J. Scrim, Chief-Policy and Rules Division; Patrick Forster, Engineer; Martin Perrine, Engineer and Raymond LaForge, Chief-Audits & Compliance Division in order to discuss issues related to the aforementioned subject.

The attached document was used for discussion purposes. Please associate this notification and the accompanying materials with the referenced docket proceeding.

If there are any questions concerning this matter, please contact the undersigned at 202 419-3020.

Sincerely,

Ben G. Almond
Vice President-Federal Regulatory Affairs

Attachment

cc: Julius Knapp
Rashmi Doshi
Alan J. Scrim
Patrick Forster
Martin Perrine
Raymond LaForge

No. of Copies rec'd 01/
List ABCDE

Hearing Aid Compatibility WT 01-309

Cingular Wireless LLC
meeting with OET
19 April 2006

Hearing Aid Compatibility

Cingular Wireless LLC & OET

Status of HAC Efforts

- Given the information provided by our vendors, Cingular believes it will meet both the August and September 2006 requirements
- Cingular continues to dedicate significant resources in order to support collaborative technical efforts through ATIS and ANSI ASC C63 SC8
- Cingular has and will continue to support outreach efforts through the HAC Incubator including development of communications materials, participation in outreach activities to consumers

Hearing Aid Compatibility

Cingular Wireless LLC & OET

- Leadership Efforts
 - Cingular strongly encourages vendors to meet the HAC requirements – efforts include direct communications from Stan Sigman to vendor CEOs as well as weekly technical calls/meetings and quarterly reviews
 - Cingular would like to be able to offer T-Coil compliant handsets to our customers as soon as feasible and ahead of the September 2006 deadline

Hearing Aid Compatibility

Cingular Wireless LLC & OET

Current Status of Standards

- The ANSI public review cycle of C63.19-2001 rd 3.12 standard has been completed and it is now an approved ANSI standard.
 - ANSI C63.19-2006, Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids (revision of ANSI C63.19-2001).
 - Announcement published in VOL. 37, #15 of ANSI Standards Action on April 14, 2006.
 - Not available for purchase yet.
 - Still has to go through the IEEE pre-publication edit process.
 - Process could take up to 3 months.

Hearing Aid Compatibility

Cingular Wireless LLC & OET

Current Status of Standards (cont'd)

- Public support exists for using C63.19-2001 rd 3.12 for HAC certification
 - ATIS recommended using on 3/27/2006 letter to FCC
 - ASC C63 recommended using on 4/10/2006 letter to FCC
- The FCC OET needs to recognize and approve the use of C63.19-2001 rd 3.12 for HAC certification to replace all earlier versions. Has a timetable been set for this to occur?

CINGULAR WIRELESS' RECOMMENDATIONS

- Approve the use of C63.19-2001 rd 3.12 / ANSI C63.19-2006 for HAC certification.
- Point to C63.19-2001 rd 3.12 / ANSI C63.19-2006 as soon as possible, preferably by end of month, but no later than May 15, 2006.

Hearing Aid Compatibility

Cingular Wireless LLC & OET Current Status of Standards (cont'd)

- Is the FCC OET currently accepting submissions for certification of handsets for T-rating compliance? Which version of the standard (C63.19-2001, rd 3.6, or rd 3.12) is recognized for T rating certification?
- How long will FCC OET take to review a submitted T rating handset report filing?
- Without T rating specific training, can TCBs submit handset reports for T rating certification?

CINGULAR WIRELESS' RECOMMENDATIONS

- Allow T-Coil Submission/Certification process to begin as soon as possible.
- When C63.19-2001 rd 3.12 / ANSI C63.19-2006 is adopted, allow handsets using 850 Waiver to obtain Permanent Grant, if achieving M1 850 using earlier version of C63.19 standard prior to C63.19-2001 rd 3.12 / ANSI C63.19-2006.
Do the handset manufacturers need to re-submit the 850/1900 M rating test data or only the 850 test data to go from waiver grant to permanent grant, if passing on 1900 (M3 or above)?
- An expedited FCC OET Process to grant permanent 850 HAC M rating authorizations to handsets utilizing the 850 Waiver is needed, prior to August Waiver expiration.

Hearing Aid Compatibility

Cingular Wireless LLC & OET

Outlook for Standards

- Future Amendment: C63.19-2001 rd 3.14 (or other designation).
 - What is the timing for adoption of the amendment?
 - Vendors indicate that design changes will be necessary to meet the additional requirements under C63.19-2001 rd 3.14

CINGULAR WIRELESS' RECOMMENDATIONS

- Allow handset manufacturers sufficient time to make changes in their product line to meet the additional requirements of C63.19-2001 rd 3.14.
- C63.19-2001 rd 3.14 should be effective after 9/18/06.
- FCC should seek a recommended effective date for adoption of C63.19-2001 rd 3.14 from the ATIS HAC Incubator.
- Allow handsets which are HAC certified to earlier versions including C63.19-2001 rd 3.12 / ANSI C63.19-2006 to be "grandfathered" for T rating, when C63.19-2001 rd 3.14 is adopted.

Hearing Aid Compatibility

Cingular Wireless LLC & OET

- HAC and Other Access Devices
 - Handsets developed to meet the unique needs of people with disabilities other than hearing loss are under development by small Assistive Technologies manufacturers. The de minimis exception would likely apply to these manufacturers.
 - It would be ideal if the FCC could establish a process for excluding disability specific designated devices from the total number of handsets considered for HAC purposes.
 - Small AT companies partner with major carriers who are able to offer discounts on their products and services benefiting consumers (for example, Talks by Cingular Wireless)
 - However, as it is now, these specialized handsets would be counted in the total number of handsets offered by carriers. This acts as a disincentive for carriers to offer these devices.